

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: March ##, 2017

Region: Mooresville Regional Office
County: Union
NC Facility ID: 9000199
Inspector's Name: Joseph Foutz
Date of Last Inspection: 08/03/2016
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Darnel, Inc. Facility Address: Darnel, Inc. 1809 Airport Road Monroe, NC 28110 SIC: 3086 / Plastics Foam Products NAICS: 32614 / Polystyrene Foam Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 2Q .0513 (renewal) NSPS: 40 CFR 60 Subpart IIII NESHAP: 40 CFR 63 Subpart ZZZZ PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A			
Contact Data				Application Data			
Facility Contact Reed Caron Quality Manager (704) 625-9869 1809 Airport Road Monroe, NC 28110	Authorized Contact Michael Vanatsky Operations Manager (704) 625-9869 1809 Airport Road Monroe, NC 28110	Technical Contact Reed Caron Quality Manager (704) 625-9869 1809 Airport Road Monroe, NC 28110	Application Number: 9000199.15A Date Received: 12/04/2015 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 09709/T03 Existing Permit Issue Date: 11/08/2011 Existing Permit Expiration Date: 10/31/2016				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	---	---	167.53	---	11.31	2.37	2.37 [Styrene]
2014	---	---	171.94	---	11.19	2.17	2.17 [Styrene]
2013	---	---	149.51	---	9.22	1.79	1.79 [Styrene]
2012	---	---	136.07	---	8.21	1.69	1.69 [Styrene]
2011	---	---	104.65	---	---	1.69	1.69 [Styrene]
Review Engineer: Richard Simpson Review Engineer's Signature:				Comments / Recommendations: Issue: 09709/T04 Permit Issue Date: March ##, 2017 Permit Expiration Date: February 28, 2022			

Date: March ##, 2017

I. Purpose of Application

Darnel, Incorporated currently holds Title V Permit No. 09709T03 with an expiration date of October 31, 2016 for a foam food packaging facility located in Monroe, Union County, North Carolina. The primary purpose of this application is for permit renewal. The renewal application was received on December 10, 2015, which was at least nine months prior to the expiration date, as required by General Permit Condition 3.K. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

According to the report for the previous compliance inspection conducted on August 3, 2016, by Joseph Foutz, DAQ-MRO Environmental Engineer, "The facility is an extruded polymer foam production facility that produces polystyrene foam products for the food industry. The finished polystyrene foam products are plates, bowls, platters, boxes, and trays. This company operates the facility 24 hrs/day, 7 days/wk, 52 wks/yr."

III. History/Background/Application Chronology

January 8, 2011 – Permit 09709T03 was submitted to the facility allowing the facility to be classified as a Title V rather than synthetic minor.

December 10, 2015 – Permit application 9000199.15A was received for a Title V renewal.

January 23, 2017 – The facility, Mooresville Regional Office, and the Stationary Compliance Section were requested by the Permitting Section to comment on the renewal. Comments were received and included in the permit.

February 3, 2017 – The Permitting Section and the facility had a conference call concerning permitted items and the facility's growth potential.

February 17, 2017 – The facility and Mooresville Regional Office were requested by the Permitting Section to comment on the updated version of the renewal. Comments were received and included in the permit.

February ##, 2017 – DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended March ##, 2017 with the receipt of no comments. The 45-day EPA review period ended March ##, 2017 with the receipt of no comments.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Cover and throughout	Throughout	Updated all tables, dates, and permit revision numbers.
Throughout	Throughout	Corrected the regulatory reference from 02D and 02Q to 02D and 02Q.

Page(s)	Section	Description of Change(s)
Attachment 1	Insignificant Activities List	Including an existing diesel-fired emergency fire pump (225 Hp) with emission source ID No. of (I-FP-1) that was installed in 2007.
Attachment 1	Insignificant Activities List	Added existing pulp thermoformers used to form plates, trays, etc. with emission source ID No. of (I-PTF).
Attachment 1	Insignificant Activities List	Inserted DEQ web link information in Item No. 3 at bottom of attachment as general information.
3	Section 1	Included column for page numbers.
4	Section 2.1 A.	In the table, inserted VOC limit for PSD avoidance and deleted VOC limit for avoidance of nonattainment since the facility is currently located in an attainment area.
4	Section 2.1 A.	In the table, inserted VOC work practice regulation with reference to Section 2.2 A.2.
4	Section 2.1 A.	In the table, inserted odor regulation with reference to Section 2.2 A.4.
5	Section 2.1 A.1.d.	Changed wording from assure to ensure.
6	Section 2.1 A.3. and 3.a.	Inserted PSD avoidance language and VOC limit. Deleted VOC limit for avoidance of nonattainment since the facility has been redesignated as an attainment area and RACT control devices were never required.
6	Section 2.1 A.3.d.	Inserted language, "All instances of deviations from the requirements of this permit must be clearly identified."
7	Section 2.2 A.	In the table, deleted "risk management plan and 15A NCAC 02Q .0508(g)" since the rule is already located in Section 3 - General Conditions.
7	Section 2.2 A.	In the table, inserted odor regulation with reference to Section 2.2 A.4. Deleted regulation for RACT since facility is in an attainment area.
8	Section 2.2 A.2.	Deleted rule 15A NCAC 02Q .0508(g) since the rule is already located in Section 3 - General Conditions.
9	Section 2.2 A.2.c.	Changed wording from assure to ensure.
9	Section 2.2 A.3.	Deleted RACT section since area is in attainment and the facility did not have controls before the redesignation.
10	Section 2.3	Included Permit Shield for Non-Applicable Requirements section.
22-36	General Conditions	Updated to latest version of DAQ shell version 4.0 12/17/15.

There were changes made to the Title V Equipment Editor (TVEE) under this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart IIII)
15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR63, Subpart ZZZZ)
15A NCAC 02D .0958, Work Practices for Volatile Organic Compounds
15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 02D .0530 Applicability)

15A NCAC 02Q .0711, Toxic Air Pollutant Emissions Limitation Requirement

A regulatory review for these existing requirements will not be included in this document. 15A NCAC 02D .0524 and 15A NCAC 02D .1111 requirements were added due to an existing 225 horsepower diesel-fired emergency fire pump that was installed in 2007. No other new regulations are necessary for this permit renewal.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility’s diesel-fired emergency fire pump (**ID No. I-FP-1**) is currently the only source at the facility subject to new source performance standard 40 CFR 60, Subpart IIII. The source was installed in 2007 and is included as an insignificant activity.

NESHAPS/MACT – The Permittee is currently subject to the Maximum Achievable Control Technology Standards 40 CFR 63 Subpart ZZZZ for an existing diesel-fired emergency fire pump (**ID No. I-FP-1**). The permit currently includes additional information to the MACT using the DAQ web page titled “Specific Permit Conditions Regulatory Guide.”

RACT – Union County has been designated as attainment. Before the redesignation date, there were no VOC control devices used at this facility and all insignificant activities emitted less than 15 pounds per day. The previous permit RACT was no additional controls. Since the facility is currently located in an attainment area and there were no previous VOC RACT control devices, RACT does not apply.

PSD – The facility is currently a PSD minor facility for VOCs and the Permittee operates under 15A NCAC 02Q .0317 “Avoidance Condition” to avoid applicability of 15A NCAC 02D .0530 “Prevention of Significant Deterioration”. To avoid applicability of this regulation, the facility’s nonfugitive emission sources listed in permit Section 2.1 A. shall discharge into the atmosphere less than 250 tons of VOCs per consecutive 12-month period. The facility must calculate monthly nonfugitive VOC emissions at the end of each month by using the following equation: $\text{VOC (tons)} = [(\text{scrap material, tons}) \times (\text{gas concentration})]$.

In the previous permit (09709T03), the sources listed in Section 2.1 A. of this permit used avoidance conditions to not be subject to 15A NCAC 02D .0531 (Sources in Nonattainment Areas). VOC avoidance condition limits for 15A NCAC 02D .0531 do not apply to the facility since Union County is currently in an attainment area.

112(r) – According to the report for the previous compliance inspection conducted on August 3, 2016, by Joseph Foutz, DAQ-MRO Environmental Engineer: “This facility is subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act. The 112(r) inspection was conducted by MRO on September 28, 2012 and stated all required elements of the RMP were found to be in order and compliance was indicated. Note that the facility now uses a mix of propane and butane as a blowing agent for the extrusion process and stores the blowing agent in the 30,000 gallon tank (I-Tank). The threshold limit for propane and butane is 10,000 pounds, each.”

CAM – 40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no permitted control devices at this facility; therefore, CAM is not applicable.

VII. Facility Wide Air Toxics

Facility-wide affected sources are subject to the TPER as listed in 15A NCAC 02Q .0711 for styrene. The potential emissions for the pollutant is less than the limit. A permit to emit the pollutant in quantities above the TPER rate requires the submittal of a permit application. No changes are needed under this permit action.

VIII. Facility Emissions Review

There is no change in Title V potential emissions for this renewal. Actual emissions from previous years are listed on Page 1.

IX. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on August 3, 2016, by Joseph Foutz, MRO indicated that the facility appeared to be in compliance with all but one of the applicable requirements. Based on his observations, an NOV will be issued to the permittee for late submission of the semi-annual report for various permit conditions.

Five-year compliance history

An NOV dated July 26, 2012 was issued to this company for failure to submit the annual Emissions Inventory by the required deadline of June 30, 2012. No enforcement action was taken by the DAQ for this violation.

An NOV dated February 11, 2014 was issued to this company for failure to submit the annual report for various stipulations identified in the air permit by the required deadline of January 30, 2014. No enforcement action was taken by the DAQ for this violation.

An NOV dated August 8, 2014 was issued to this company for failure to submit the semi-annual report for various stipulations identified in the air permit by the required deadline of July 30, 2014. The semi-annual report was post-marked July 31, 2014. No enforcement action was taken by the DAQ for this violation.

An NOV/NRE dated November 7, 2016 was issued to this company for failure to submit the semi-annual report for various stipulations identified in the air permit by the required deadline of July 30, 2016. The semi-annual report was post-marked August 11, 2016.

X. Public Notice/EPA and Affected State(s) Review

A thirty-day public notice period and a forty-five day EPA review period is required for the renewal of the Title V permit. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to the EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

EPA's 45 Day Review period

Ms. Heather Ceron (U.S. EPA, Region IV) was provided a PROPOSED permit for review on February ##, 2017. EPA 45-day review period ended on March ##, 2017. No comments were offered or received.

Public Notice

The 30-day public notice of the proposed permit was posted on the NCDAQ website on February ##, 2017. No comments were offered or received.

XI. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this renewal.
- Since this application was a renewal with no modification, no emission increases were noted for the PSD increment tracking purposes.

XII. Recommendations

The permit renewal application for Darnell, Inc. in Monroe, Union County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 09709T04.